

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

**IN RE: JOHNSON & JOHNSON
TALCUM POWDER PRODUCTS
MARKETING, SALES
PRACTICES, AND PRODUCTS
LIABILITY LITIGATION**

**Civil Action No. 3:16-md-2738-
FLW-LHG
MDL No. 2738**

THIS DOCUMENT RELATES TO ALL CASES

CERTIFICATION OF MICHELLE A. PARFITT, ESQ.

Michelle A. Parfitt, Esq., hereby certifies as follows:

1. I am an attorney at law and member of the law firm of Ashcraft & Gerel, LLP. I was appointed as Co-Lead Counsel to represent all Plaintiffs in the above-captioned matter.
2. I submit this Certification based on personal knowledge in support of the Plaintiffs' Steering Committee's Post-*Daubert* Hearing Summation Brief.
3. Attached hereto as Exhibit 1 is a true and correct copy of the powerpoint presentation of Dr. Anne McTiernan from the *Daubert* hearing on July 25, 2019.
4. Attached hereto as Exhibit 2 is a true and correct copy of Taher, et al., *Critical review of the association between perineal use of talc powder and risk of ovarian cancer*, 90 Reproductive Toxicology 88 (2019).

5. Attached hereto as Exhibit 3 is a true and correct copy of the powerpoint presentation of Dr. Daniel Clarke-Pearson from the Daubert hearing on July 30, 2019.

6. Attached hereto as Exhibit 4 is a true and correct copy of the powerpoint presentation of Dr. Arch Carson from the Daubert hearing on July 29, 2019.

7. Attached hereto as Exhibit 5 is a true and correct copy of Harrington, et al., *New guidelines for statistical reporting in the Journal*, 381 N.E.J.M. 285-286 (Jul. 18, 2019).

8. Attached hereto as Exhibit 6 is a true and correct copy of Gabriel, et al. *Douching, talc use, and risk for ovarian cancer and conditions related to genital tract inflammation*, Cancer Epidemiology, Biomarkers, and Prevention (accepted for publication Aug. 16, 2019).

9. Attached hereto as Exhibit 7 is a true and correct copy of Mossman, *Assessment of the pathogenic potential of asbestos vs. nonasbestiform particulates (cleavage fragments) in in vitro (cell or organ culture) models and bioassays*, Regul Toxicol Pharmacol 2008;52 (Supp. 1): S200-3 (2007).

10. Attached hereto as Exhibit 8 is a true and correct copy of powerpoint presentation of Dr. William Longo from the *Daubert* hearing on July 24, 2019.

11. Attached hereto as Exhibit 9 is a true and correct copy of Tab 17 of the Bench Book of Dr. William Longo, presented at the *Daubert* Hearing on July 24, 2019 (Bates JNJNL61_000029410 – JNJNL61_000029443).

12. Attached hereto as Exhibit 10 is a true and correct copy of Tab 20 of the Bench Book of Dr. William Longo, presented at the *Daubert* Hearing on July 24, 2019 (52 Fed. Reg. 41826 (codified at 40 C.F.R. 763), *Asbestos-Containing Materials in Schools* (Oct. 30, 1987)).

13. Attached hereto as Exhibit 11 is a true and correct copy of Tab 19 of the Bench Book of Dr. William Longo, presented at the *Daubert* Hearing on July 24, 2019 (ASTM Designation: D5755-09; “Standard Test Method for Microvacuum Sampling and Indirect Analysis of Dust by Transmission Electron Microscopy for Asbestos Structure Number Surface Loading” (Reapproved 2014)).

14. Attached hereto as Exhibit 12 is a true and correct copy of Tab 6 of the Bench Book of Dr. William Longo, presented at the *Daubert* Hearing on July 24, 2019 (Bates JNJNL61_000043150- JNJNL61_000043154).

15. Attached hereto as Exhibit 13 is a true and correct copy of Longo Exhibit 4 presented at the *Daubert* Hearing on July 24, 2019 (Block, et al., *Stimuli to the revision process: Stimuli articles do not necessarily reflect the policies of the USPC or the USP Council of Experts*, http://www.usppf.com/pf/pub/data/v404/GEN_STIMULI_404_s201184.html).

16. Attached hereto as Exhibit 14 is a true and correct copy of Tab 10 of the Bench Book of Dr. William Longo, presented at the *Daubert* Hearing on July 24, 2019 (Longo, et al., *Crocidolite asbestos fibers in smoke from original Kent cigarettes*, 55 Cancer Research 2232-2235 (June 1, 1995)).

17. Attached hereto as Exhibit 15 is a true and correct copy of Tab 11 of the Bench Book of Dr. William Longo, presented at the *Daubert* Hearing on July 24, 2019 (Longo, et al., *Fiber release during the removal of asbestos-containing gaskets: a work practice simulation*, 17 Applied Occupational and Environmental Hygiene 55-62 (2002)).

18. Attached hereto as Exhibit 16 is a true and correct copy of Tab 12 of the Bench Book of Dr. William Longo, presented at the *Daubert* Hearing on July 24, 2019 (Ewing, et al., *Zonolite attic insulation exposure studies*, 16 Int J Occup Environ Health 279-290 (2010)).

19. Attached hereto as Exhibit 17 is a true and correct copy of Tab 10A of the Bench Book of Dr. William Longo, presented at the *Daubert* Hearing on July 24, 2019 (Longo and Roggeli, *Mineral Fiber Content of Lung Tissue in Patients with Environmental Exposures: Household Contacts vs. Building Occupants*, The Third Wave of Asbestos Disease: Exposure to Asbestos in Place, Annals of The New York Academy of Sciences, Vol. 643).

20. Attached hereto as Exhibit 18 is a true and correct copy of Tab 22 of the Bench Book of Dr. William Longo, presented at the *Daubert* Hearing on July 24, 2019 (Millette, *Procedure for the analysis of talc for asbestos*, 61 The Microscope 11-20 (2015)).

21. Attached hereto as Exhibit 19 is a true and correct copy of Tab 9C of the Bench Book of Dr. William Longo, presented at the *Daubert* Hearing on July 24, 2019 (Bates Longo-MDL_00324).

22. Attached hereto as Exhibit 20 is a true and correct copy of Tab 9A of the Bench Book of Dr. William Longo, presented at the *Daubert* Hearing on July 24, 2019 (Longo-MDL_00881, Longo-MDL_00893, Longo-MDL_00897, Longo-MDL_00875, Longo-MDL_00878, Longo-MDL_000879, Longo-MDL_00880).

23. Attached hereto as Exhibit 21 is a true and correct copy of Longo-MDL_00325.

24. Attached hereto as Exhibit 22 is a true and correct copy of Tab 6A of the Bench Book of Dr. William Longo, presented at the *Daubert* Hearing on July 24, 2019 (Bates JNJNL61_000005032-JNJNL61_000005040).

25. Attached hereto as Exhibit 23 is a true and correct copy of Tab 52 of the Bench Book of Dr. William Longo, presented at the *Daubert* Hearing on July 24, 2019 (“MAS TEM Coefficient of Variation for Tremolite and Anthophyllite in Talc: A Quality Control Study”, Sept. 6, 2018).

26. Attached hereto as Exhibit 24 is a true and correct copy of Tab 29 of the Bench Book of Dr. William Longo, presented at the *Daubert* Hearing on July 24, 2019 (J3 Resources, “Verified Analysis of 22 Asbestos Structures Identified by MAS in Six Historical Johnson’s Baby Powder Samples (M69042), Nov. 7, 2018).

27. Attached hereto as Exhibit 25 is a true and correct copy of Tab 29A of the Bench Book of Dr. William Longo, presented at the *Daubert* Hearing on July 24, 2019 (J3 Resources Letter and report, “JH1898969 Analysis of Shower to Shower Talc Samples,” July 13, 2018).

28. Attached hereto as Exhibit 26 is a true and correct copy of Tab 9 of the Bench Book of Dr. William Longo, presented at the *Daubert* Hearing on July 24, 2019 (MAS Supplemental Report, “The Analysis of Johnson & Johnson’s Historical Product Containers and Imerys’ Historical Railroad Car Samples from the 1960’s to the Early 2000’s for Amphibole Asbestos,” Jan. 15, 2019).

29. Attached hereto as Exhibit 27 is a true and correct copy of Longo Hearing Exhibits 3A-3J, presented at the *Daubert* Hearing on July 24, 2019 (Bates Longo-MDL_00867-Longo-MDL_00870, Longo-MDL_00859- Longo-MDL_00862, Longo-MDL_01482, Longo-MDL_01491).

30. Attached hereto as Exhibit 28 is a true and correct copy of Tab 29B of the Bench Book of Dr. William Longo, presented at the *Daubert* Hearing on July 24, 2019 (*Hayes v. Colgate-Palmolive*, No. 16-CI-004503, Jefferson Circuit Court,

Div. 10, Kentucky, Order regarding Motions to Exclude Expert Opinions of Dr. Ronald Dodson, Mr. Lee Poye, and Dr. Mark Taragin, and to reconsider ruling regarding vintage talcum powder samples, July 12, 2019).

31. Attached hereto as Exhibit 29 is a true and correct copy of Tab 43, Exhibit 1 of the Bench Book of Dr. William Longo, presented at the *Daubert* Hearing on July 24, 2019 (US EPA Region IX, “Response to the November 2005 National Stone, Sand & Gravel Association Report Prepared by the R.J. Lee Group, Inc ‘Evaluation of EPA’s Analytical Data from the El Dorado Hills Asbestos Evaluation Project’” (Apr. 20, 2006)).

32. Attached hereto as Exhibit 30 is a true and correct copy of an email from IARC Publications to Tram Nguyen, dated Aug. 28, 2019.

33. I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I may be subject to punishment.

Dated: October 7, 2019

/s/ Michelle A. Parfitt
Michelle A. Parfitt